Administrative Motion To File Under Seal

1	Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for				
2	administrative relief to file under seal the individual Ex Parte Applications for Appointment of				
3	Guardians Ad Litem ("Applications") described in Plaintiffs' Seventh Consolidated Ex Parte				
4	Application for Appointment of Guardians Ad Litem ("Ex Parte Application") and attached as				
5	Exhibits 1-5 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Seventh				
6	Consolidated Ex Parte Application for Appointment of Guardians Ad Litem ("Anderson				
7	Declaration").				
8	The Applications for which sealing is sought are:				
9	• B.A., individually and as next of friend to minor J.A. v. Meta Platforms, Inc., et al., 4:23-				
10	cv-05055 (Exhibit 1);				
11	• C.C., individually and as next of friend to minor M.C. v. Meta Platforms, Inc., et al.,				
12	2023-cv-06277 (Exhibit 2);				
13	• S.F., individually and as next of friend to minor D.F. v. Meta Platforms, Inc., et al., 4:23-				
14	cv-06287 (Exhibit 3);				
15	• C.R., individually and as next of friend to minor S.G. v. Meta Platforms, Inc., et al, 4:23-				
16	ev-06301 (Exhibit 4); and				
17	• V.K., individually and as next of friend to minor A.K. v. Meta Platforms, Inc., 4:23- cv-				
18	05093 (Exhibit 5).				
19	This motion is accompanied by a [Proposed] Order and the Declaration of Jennie Lee				
20	Anderson in Support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the				
21	Declaration of Jennie Lee Anderson in Support of Plaintiffs' Seventh Consolidated Ex Parte				
22	Application for Appointment of Guardians Ad Litem ("Anderson Decl. ISO Admin Motion"),				
23	pursuant to Civil Local Rules 7-11 and 7-12. See Civ. L. R. 79-5(c).				
24	This Court previously considered and finding good cause granted Plaintiffs' request to				
25	seal applications for guardian <i>ad litem</i> in this case. ECF No. 16.				
26	Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants for a				
27	standing stipulation that Applications may be filed under seal. Liaison Counsel for Defendants				
28	confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right t				

1	seek an order or orders in the future to unseal individual applications and/or require parents who					
2	wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl.					
3	ISO Admin. Mot. to Seal, ¶5.					
4	For the reasons set forth above, Plaintiffs respectfully request that the Court enter the					
5	[Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Exhibits In					
6						
	Support of Plaintiffs' Seventh <i>Ex Parte</i> Application for Appointment of Guardians <i>Ad Litem</i> .					
7		D				
8	• •	Respectfully submitted,				
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		•				
	Administrative	Case No. 4:22-MD-03047-YGI Motion To File Under Seal				

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